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9 **CHARLES GRAHL**, individually and
on behalf of all others similarly situated

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CHARLES GRAHL, individually and on
Behalf of all others similarly situated,

Plaintiff,

VS.

18 **CIRCLE K STORES, INC.**, a foreign
corporation: **DOES I** through **V**, inclusive;
19 and **ROE** corporations **I** through **V**,
inclusive.

Defendants.

Case No. 2:14-cv-00305-VCF

**STIPULATION AND ORDER EXTENDING THE
TIME FOR THE PARTIES TO FILE THEIR JOINT
MOTION FOR FINAL APPROVAL OF
SETTLEMENT, ATTORNEYS' FEES, COSTS, AND
ENHANCEMENT AWARD**

(FIRST REQUEST)

22 Pursuant to LR 7-1, LR IA 6-1, LR IA 6-2, and LR 26-4, the Parties, by and through
23 undersigned counsel of record, hereby stipulate and request that the Court extend the deadline
24 for the Parties to file their Joint Motion For Final Approval of Settlement, Attorneys' Fees, Costs,
25 and Enhancement Award ("Joint Motion") from the current deadline of Wednesday, March 27,
26 2019, up to and including Monday, April 1, 2019. This is the parties' first request for an extension
27 of the deadline to file the Joint Motion.

1 On December 12, 2018, the Court entered its Order Granting Motion for Approval of Class
2 Action Settlement Agreement and Release. (ECF No. 345.) In that Order, the Court implemented
3 a schedule for the claims administration procedure. (*Id.*) The Court also ordered that the parties
4 file their Joint Motion by March 27, 2019. (*Id.* at pgs. 4-6.) The Court scheduled the final fairness
5 hearing for April 8, 2019, at 10:00 a.m. (*Id.* at pg. 5.)

6 Due to some unforeseen delays in finalizing the Class Member's last known addresses and
7 data to determine the Class Member's pro rata share of the Net Settlement Fund, Simpluris, Inc.,
8 settlement claims administrator, ("Simpluris") mailed the Notice Packet on January 24, 2019.
9 Class Members had up to and including March 25, 2019 to submit their Claim Forms.

10 Plaintiff's counsel has prepared a preliminary draft of the Parties' Joint Motion for Final
11 Approval. Defendant's counsel is in the process of reviewing the draft Joint Motion for additional
12 comments. Additionally, the Parties are awaiting final return numbers from Simpluris including
13 number of valid claim forms, whether any objections were received, and Simpluris' calculations
14 regarding how much of the Net Settlement Fund each claimant is entitled to receive. This
15 information, along with the final break down of attorneys' fees, costs, third-party administration
16 costs, and class representative enhancement award, will be included in the Joint Motion for the
17 Court's review.

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1 Therefore, the parties request that the Court grant them an extension up to and including
2 April 1, 2019, to file the Joint Motion. Additionally, the parties request that the Court keep the
3 final fairness hearing on calendar for April 8, 2019, at 10:00 a.m.

4 Dated: Wednesday, March 27, 2019.

Dated: Wednesday, March 27, 2019.

5 REMPFER MOTT LUNDY, PLLC

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

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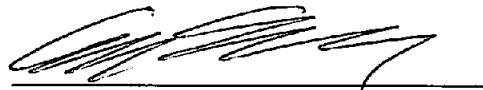
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ORDER

14 IT IS SO ORDERED. *[Signature]*

15 Dated: March 27, 2019.



U.S. MAGISTRATE JUDGE

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